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Counsel for Defendant LEPP

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 04-0317 MHP
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER VACATING JANUARY 9, 2007
vs.)	HEARING DATE, SETTING STATUS
)	DATE FOR JANUARY 22, 2007, AND
CHARLES EDWARD LEPP,)	EXCLUDING TIME
)	
Defendant.)	
)	

STIPULATION

The undersigned parties stipulate as follows:

1. Counsel for defendant Charles Edward Lepp and the government hereby jointly request that the January 9, 2007 evidentiary hearing date be vacated, to be re-set at a later date if necessary.
2. Defense counsel needs additional time to meet with her client on attorney-client related issues relating to the ongoing litigation of the criminal case, and the relationship between the criminal case and the pending civil cases, C 04-5401 and C 05-00897 (forfeiture) and C 06-4264.
3. The government has provided the defense with additional discovery. The defense is in

1 the process of reviewing the discovery. The parties are continuing to meet and confer to
2 determine if there are any outstanding discovery issues.

3 4. The parties request that the matter be set for a status and setting appearance on January
4 22, 2007 or any other date convenient to the Court.

5 5. The parties agree that time up to January 22, 2007 will continue to be excluded from the
6 computation of time within which the trial of this matter must commence in light of
7 defendant's pending pretrial motions. 18 U.S.C. § 3161(h)(1).

8 IT IS SO STIPULATED

9
10 Date: December 29, 2006

/s/
SHAWN HALBERT
Assistant Federal Public Defender


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13 Date: December 29, 2006

/s/
DAVE HALL
Assistant United States Attorney

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17 ~~PROPOSED~~ ORDER

18 For good cause appearing, IT IS HEREBY ORDERED that the evidentiary hearing date
19 currently set for January 9, 2007 be vacated, to be re-set for a later date if necessary. IT IS
20 FURTHER ORDERED that time from January 9, 2007 to January 22, 2007 will continue to be
21 excluded from the computation of time within which the trial of this matter must commence in
22 light of defendant's pending pretrial motions. 18 U.S.C. § 3161(h)(1).

23 Dated: Jan. 3, 2007

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25 
26 Honorable Marilyn Hall Patel
United States District Court Judge